

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION RECEIVED

Washington, D.C. 20554

SEP 26 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

Amendment of Section 73.202(b)  
Table of Allotments  
FM Broadcast Stations  
(Cloverdale, Alabama)

MM Docket No. 94-78  
RM-8472

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

DOCKET FILE COPY ORIGINAL

JOINT COUNTERPROPOSAL

North Jefferson Broadcasting Company, Inc.<sup>1/</sup> ("WLBI"), licensee of Station WLBI(FM), Warrior, Alabama, and Deep South Broadcasting Company, Inc. ("WBAM"), licensee of Station WBAM(FM), Montgomery, Alabama (also referred to as "joint petitioners"), jointly, by their counsel, hereby submit a counterproposal to the Notice of Proposed Rule Making, 9 FCC Rcd 3311 (1994) proposing to allot Channel 254A to Cloverdale,

<sup>1/</sup> The Commission's records incorrectly list Theresa B. Lowry as the licensee. On March 5, 1992, she filed an application for assignment of her permit to North Jefferson Broadcasting Company, Inc. (BAPH-920305GL). After Commission approval on March 17, 1992, the parties notified the Commission of consummation.

No. of Copies rec'd  
List ABCDE

044

Alabama, as its first local service.<sup>2/</sup> The joint petitioners request instead that the Commission substitute Channel 254C1 for Channel 254C3<sup>3/</sup> at Warrior and modify the license for WLBI, accordingly. In addition, to permit the Warrior substitution, the joint petitioners request that Station WBAM be downgraded from Channel 255C to Channel 255C1 or, in the alternative, Channel 255C2 and the license for WBAM be modified accordingly. The counterproposal is set forth as follows:

	<u>Add</u>	<u>Delete</u>
Cloverdale, Alabama	---	---
Montgomery, Alabama	255C1 or C2	255C
Warrior, Alabama	254C1	254C3

In support hereof, the joint petitioners state as follows:

1. According to the attached channel study and engineering statement from Mullaney Engineering, Inc., Channel 254C1 can be allotted to Warrior with a reference point approximately five miles south pursuant to Section 73.207(b) of the Commission's Rules, provided WBAM downgrades to either a Class C1 or Class C2 facility and provided Channel 254A is not

---

<sup>2/</sup> The Commission specified Saturday, September 3, 1994, as the comment deadline. This counterproposal is timely filed on the next business day following a holiday pursuant to Section 1.4 of the Commission's Rules.

<sup>3/</sup> Station WLBI currently operates as a Class A station. On August 23, 1994, WLBI filed its application for Channel 254C3 (BPH-940823IR) to implement MM Docket 93-277.

allotted to Cloverdale.<sup>4/</sup> The coordinates for the Warrior proposal are: 33° 44' 30" and 86° 48' 30". At this location, WLBI can provide the required 70 dBu signal over Warrior pursuant to Section 73.315(a) of the Commission's Rules. As indicated in the engineering statement, the public interest will be served by the upgrade of WLBI to a Class C1 facility by increasing the population to be served within the proposed 60 dBu contour by 691,086 persons for a total population of 1,036,922.

WBAM consents to the downgrade of its station to Class C1 at a restricted site location and states it will apply to relocate its station's transmitter site, if necessary, to accommodate the proposed upgrade for WLBI. At the restricted site specified in the engineering statement, the Commission's spacing requirements and principal community coverage requirements will be met.

---

<sup>4/</sup> In a separate filing in MM Docket 94-64, the Joint petitioners have filed reply comments that demonstrate that both of the proposals filed in that proceeding for Ider, Alabama, and for Lookout Mountain, Georgia, respectively are defective. Comments filed in that proceeding reveal that the site restriction required for Ider will prohibit principal community coverage. The joint petitioners have filed reply comments which support the showing of a city grade deficiency. In addition, the reply comments point out that the Lookout Mountain proposal did not provide the required verification. Furthermore, the site restriction necessary for the Lookout Mountain proposal will fail to provide that community with a 70 dBu signal. Therefore, since there is a reasonable certainty that both the Ider and Lookout Mountain proposals will be denied, it is not in the public interest to make WLBI and WBAM wait until those proposals are denied to file this counterproposal.

As an alternative, WBAM requests that the Commission downgrade WBAM to a Class C2 facility at its current site. This alternative proposal is submitted in the event that Channel 255C1 at the specified reference point is not granted. A channel study is also provided to demonstrate that Channel 255C2 at the current site will comply with the spacing rules and accommodate WLBI's increase to Class C1. WBAM consents to a downgrade only in event that WLBI's upgrade proposal is granted. The public interest will be served with either proposal because when considered as a consolidated proposal with WLBI's upgrade, the overall benefit is an increase in population by 651,499 with a Class C1 at Montgomery and an increase of 546,706 persons should WBAM downgrade to Class C2.

The joint petitioners recognize that under the Commission's allocation priorities, Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982), a first local service at Cloverdale would be preferred to the WLBI/WBAM proposal. However, as the Commission recognized in the NPRM, the petitioner in this proceeding, Pulaski Broadcasting, Inc., ("Pulaski"), has not demonstrated that Cloverdale is a community within the meaning of Section 307(b) of the Communications Act of 1934, as amended.

Cloverdale is not listed in the 1990 U.S. Census as a community. The only listing for Cloverdale is a census county division. However, the Commission has never recognized census

divisions as constituting a community. See e.g., Trade, Tennessee, and Beech Mountain, North Carolina, 6 FCC Rcd 5835 (1991).

Cloverdale does not have a local government and does not provide municipal services such as water, sewerage, police, education, etc., to any recognizable group of residents. There is a loosely assembled volunteer fire department, but it is common to have fire departments for geographic units larger than a community such as the census division of a county. There is no downtown business district nor social organizations that could be identified by the joint petitioners. The presence of a post office is not sufficient to establish community status. See Columbia, California, 6 FCC Rcd 3292 (1991) and Coker, Alabama, 43 RR 2d 190 (1978). Clearly, the petitioner, Pulaski, has not satisfied its burden of demonstrating community indicia. The joint petitioners will submit a reply addressing this issue in further detail should the petitioner embellish its community showing.

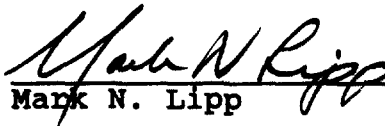
Accordingly, the joint petitioners urge the Commission to deny the proposal for Cloverdale and, instead, grant the proposed substitution of channels at Warrior and Montgomery for Stations WLBI and WBAM. The joint petitioners state that each

will file the appropriate applications for the new class of channels and construct the modified facilities should this proposal be granted.

Respectfully submitted,

**NORTH JEFFERSON BROADCASTING COMPANY, INC.  
DEEP SOUTH BROADCASTING COMPANY, INC.**

By:

  
Mark N. Lipp

Mullin, Rhyne, Emmons and Topel, P.C.  
1225 Connecticut Avenue, N.W., Suite 300  
Washington, D.C. 20036

Their Counsel

September 6, 1994

JOHN J. MULLANEY  
JOHN H. MULLANEY, P.E.

**MULLANEY ENGINEERING, INC.**

8049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877

301 921-0115

**ENGINEERING EXHIBIT EE:**

**JOINT COUNTER PROPOSAL TO  
FM DOCKET 94-78 - CLOVERDALE, ALABAMA  
CH. 254C1 WARRIOR, AL / 255C1 MONTGOMERY, AL**

**SEPTEMBER 3, 1994**

**ENGINEERING STATEMENT IN SUPPORT OF A  
JOINT PETITION FOR RULE MAKING  
TO AMEND  
THE FM TABLE OF ASSIGNMENTS**

**JOINTLY PREPARED ON BEHALF OF  
DEEP SOUTH BROADCASTING CO., INC.  
NORTH JEFFERSON BROADCASTING CO., INC.**

**ORIGINAL  
SIGNATURE**

**MULLANEY ENGINEERING, INC.**

**ENGINEERING EXHIBIT EE:**

**JOINT COUNTER PROPOSAL TO  
NM DOCKET 94-78 - CLOVERDALE, ALABAMA  
CH. 254C1 WARRIOR, AL / 255C1 MONTGOMERY, AL**

**TABLE OF CONTENTS:**

1. Declaration of Engineer
2. Narrative Statement.
3. Figure 1, Map Showing Warrior & Montgomery, AL.
4. Figure 2, Channel Study for Ch. 254C1 - Warrior, AL.  
(from the Requested Reference Coordinates)
5. Figure 3, Channel Study for Ch. 255C1 - Montgomery, AL.  
(from the Requested Reference Coordinates)
6. Figure 3-A, Channel Study for Ch. 255C2 - Montgomery, AL.  
(from the WBAM Licensed Site)

**MULLANEY ENGINEERING, INC.**

**DECLARATION**

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. from Catholic University, and my qualifications are known to the Federal Communications Commission, and that I am an engineer in the firm of Mullaney Engineering, Inc., and that firm has been retained by North Jefferson Broadcasting Co., Inc., licensee of WLBI at Warrior, Alabama & on behalf of Deep South Broadcasting Co., Inc., licensee of WBAM Montgomery, Alabama, to prepare an engineering statement in support of a Joint Petition to Amend the FM Table of Assignments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

  
John J. Mullaney

Executed on the 3rd day of September 1994.

**MULLANEY ENGINEERING, INC.**

**ENGINEERING EXHIBIT EE:**

**JOINT COUNTER PROPOSAL TO  
MM DOCKET 94-78 - CLOVERDALE, ALABAMA  
CH. 254C1 WARRIOR, AL / 255C1 MONTGOMERY, AL**

**NARRATIVE STATEMENT:**

**I. GENERAL:**

This engineering statement has been prepared on behalf of North Jefferson Broadcasting Co., Inc., licensee of WLBI at Warrior, Alabama & on behalf of Deep South Broadcasting Co., Inc., licensee of WBAM Montgomery, Alabama. The purpose of this statement is to support a joint request that the FM Table of Assignments be amended to simultaneously upgrade WLBI from Ch. 254C3 to 254C1 and to downgrade WBAM from Ch. 255C to 255C1. In the event that Ch. 255C1 at Montgomery with a site restriction is not granted, WBAM will consider a downgrade to C2 facilities. This proposal is submitted as a counter proposal in MM Docket 94-78 involving the allotment of Ch. 254A to Cloverdale, Alabama.

WLBI is the only aural service licensed to Warrior, AL, and the increase in power from 25 KW to 100 KW will permit it to serve a wider area.

WLBI wishes to point out that the upgrade it seeks is on its existing channel and, therefore, it is not necessary to demonstrate the availability of an additional equivalent channel in this type of proceeding in accordance with Section 1.420(g) of the rules. It should also be noted that the upgrade is contingent upon the

simultaneous downgrade of WBAM at Montgomery, AL. In the event it becomes impossible for WLBI to obtain the requested upgrade WBAM would withdraw its request for downgrade.

## II. ENGINEERING DISCUSSION:

### A. Special Reference - Ch. 254C1 - Warrior, AL:

Because of required FCC separations and FAA constraints, WLBI requests the use of a special reference point for the allocation.

The following geographic coordinates are for a site which is 8 kilometers (5 miles) south of Warrior, AL:

Latitude:        33° 44' 30"  
Longitude:       86° 48' 30"

The proposed site will provide an unobstructed view of the City of License, Warrior, AL, and is located close enough to serve the entire Community with the required 3.16 mV/M contour. Figure 1 is a map illustrating the location of this site. An HAAT of 30.3 meters with an ERP of 100 kW is sufficient to provide a 70 dBu signal over the entire city (within 11 kilometers of entire city).

#### 1. Channel Allocation Study - Warrior, AL:

Figure 2 is a Channel Allocation Study from the Special Reference Point proposed herein for Warrior, AL. This study indicates the required separation in kilometers to all known Licenses, Construction Permits, Open Allocations, pending Applications, and pending Rule Makings.

From this study it can be determined that the proposed special reference point is mutually exclusive with the proposal in MM Docket 94-78 involving the allotment of Ch. 254A to Cloverdale, AL & with the proposal in MM Docket 94-64 involving the allotment of Ch. 254A to Ider, AL, or to Lookout Mountain, GA. In all other respects the proposed upgrade at Warrior exceeds all of the minimum separations provided WBAM downgrades to a C1/C2 as proposed herein.

With respect to Cloverdale the Warrior upgrade should be considered a counter proposal.

With respect to the Ider / Lookout Mountain proposals the Warrior upgrade is mutually exclusive. However, simultaneously with the filing of this counter proposal the Joint Petitioners have filed a joint reply to both Ider & Lookout Mountain. The reply indicates that the proposal at Ider, AL, fails to provide any portion of that city with the required 70 dBu (3.16 mV/m) contour as computed using the F(50,50) curves. While the counter proposal at Lookout Mountain, GA, provides a theoretical F(50,50) city grade they failed to disclose the fact that the entire community of Lookout Mountain is shielded by a mountain ridge preventing substantial line of sight as required by the rules (73.315(b)). Based upon the above and other defects documented in the joint reply it is believed that the allotment to either Ider or Lookout Mountain is fatally flawed.

**B. Special Reference - Ch. 255C1 - Montgomery, AL:**

Because of required FCC separations and FAA constraints, WBAM requests the use of a special reference point for the allocation.

The following geographic coordinates are for a site which is 21 kilometers (13 miles) southeast of Montgomery, AL:

Latitude: 32° 14' 45"  
Longitude: 86° 07' 30"

The proposed site will provide an unobstructed view of the City of License, Montgomery, AL, and is located close enough to serve the entire Community with the required 3.16 mV/M contour. Figure 1 is a map illustrating the location of this site. An HAAT of 110 meters with an ERP of 100 kW is sufficient to provide a 70 dBu signal over the entire city (within 33 kilometers of entire city).

**1. Channel Allocation Study - Montgomery, AL:**

Figure 3 is a Channel Allocation Study from the Special Reference Point proposed herein for Montgomery, AL. This study indicates the required separation in kilometers to all known Licenses, Construction Permits, Open Allocations, pending Applications, and pending Rule Makings.

From this study it can be determined that the proposed special reference point exceeds all of the minimum separations.

**C. Simultaneous Upgrade & Downgrade:**

Using the special reference points as requested for both Warrior and Montgomery it has been determined that they are 177.75 kilometers apart. Inasmuch as the required 1st adjacent C1 to C1 separation is 177 kilometers it is obvious that no short spacing will exist.

In the event that the Ch. 255C1 at Montgomery is not granted, WBAM is willing to remain at its existing site and to downgrade to a Ch. 255C2. Using the special reference point for Warrior and the licensed site for Montgomery it has been determined that they are 159.06 kilometers apart. Inasmuch as the required 1st adjacent C1 to C2 separation is 158 kilometers it is obvious that no short spacing will exist. Figure 3-A is a channel study from WBAM's licensed site assuming C2 facilities.

Regardless of which proposal is adopted for Montgomery, it should be noted that a downgrade by WBAM will eliminate a grandfathered short spacing to WAWV which operates on Ch. 252A at Sylacauga, AL. This will permit WAWV to fully comply with the 6 kW Class A separations for the first time from their existing site.

**D. Public Interest Showing:**

**Upgrade at Warrior**

WLBI at Warrior is presently authorized to operate a Class C3 FM with 25 KW at 100 meters. The proposed substitution of Class C1 facilities will permit Warrior to increase to 100 KW at 299 meters. The

increase in power will extend the 1.0 mV/M contour from its present 39.1 km to 72.4 km. This will permit Warrior to increase its population served by approximately 691,985 persons for a total population service of 1,036,922 persons based upon the 1990 Census.

#### **Downgrade at Montgomery**

WBAM at Montgomery currently operates with an ERP of 100 kW at an HAAT of 334 meters. The proposed downgrade to Class C1 facilities will result in a 39,587 person reduction of population served for a total population service of 406,115 persons based upon the 1990 Census. A population gain ratio of 17.5 to 1.0 when comparing Warrior to Montgomery.

In the unlikely event of a simultaneously filed conflicting counter proposal, WBAM will consider accepting a downgrade to 255C2 provided Warrior is given 254C1. The proposed downgrade to Class C2 facilities will result in a 144,380 person reduction of population served for a total population service of 301,322 persons based upon the 1990 Census. A population gain ratio of 4.8 to 1.0 when comparing Warrior to Montgomery.

It should be noted that there are three other Class C facilities operating from WBAM's existing site with the exact same power & height as WBAM. Consequently, more than sufficient FM service will remain available from WBAM's existing site. In addition, it should be noted that there are six AMs and

**Radio Station WLBI & WBAM (9/94)**

**Upgrade/Downgrade - Warrior/Montgomery**

**MULLANEY ENGINEERING, INC.**

eight FMs licensed to Montgomery, AL.

Regardless of which proposal is adopted for Montgomery, it should be noted that a downgrade by WBAM will eliminate a grandfathered short spacing to WAWV which operates on Ch. 252A at Sylacauga, AL. This will permit WAWV to fully comply with the 6 kW Class A separations for the first time from their existing site.

The Joint Petitioners believe that the potential 691,985 persons increase in population for Warrior is more than sufficient to justify a 39,587 person reduction in population for Montgomery. In addition, the downgrade at Montgomery will eliminate a grandfathered short spacing. Based upon the above reasons the requested channel upgrade / downgrade is in the Public Interest and should therefore be granted by the Commission.

**Radio Station WLBI & WBAM (9/94)**

**Upgrade/Downgrade - Warrior/Montgomery**

**MULLANEY ENGINEERING, INC.**

**III. SUMMARY:**

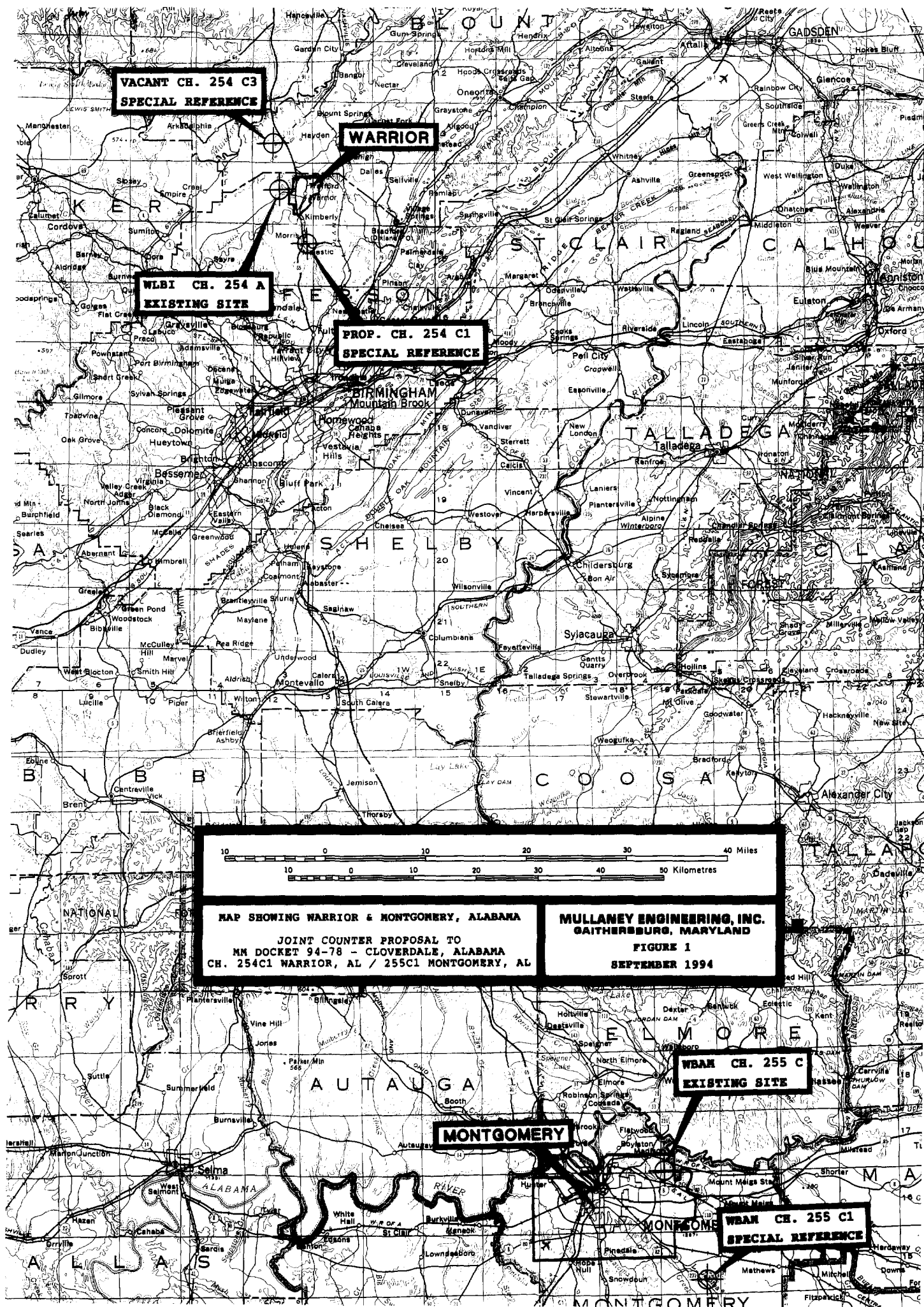
North Jefferson Broadcasting Co., Inc., licensee of WLBI at Warrior, Alabama, & Deep South Broadcasting Co., Inc., licensee of WBAM Montgomery, Alabama, requests that the FM Table of Assignments be amended as follows:

City	Present	Proposed
<b>Option I</b>		
*****		
Ider, AL or		
Lookout Mtn., GA	-	-
Cloverdale, AL	-	-
Warrior, AL	254C3	254C1
Montgomery, AL	255C	255C1
<b>Option II</b>		
*****		
Ider, AL or		
Lookout Mtn., GA	-	-
Cloverdale, AL	-	-
Warrior, AL	254C3	254C1
Montgomery, AL	255C	255C2

The joint petitioners believe that the proposed upgrade to Class C1 facilities of the only aural service assigned to Warrior, AL, will Serve the Public Interest.

September 3, 1994.

  
John J. Mullaney



MAP SHOWING WARRIOR & MONTGOMERY, ALABAMA  
JOINT COUNTER PROPOSAL TO  
MM DOCKET 94-78 - CLOVERDALE, ALABAMA  
CH. 254C1 WARRIOR, AL / 255C1 MONTGOMERY, AL

MULLANEY ENGINEERING, INC.  
GAITHERSBURG, MARYLAND  
FIGURE 1  
SEPTEMBER 1994

\*\*\*\*\*

LAST UPDATE: 940818

\*\*\*\*\*

MLBI	254 C1	FR	POLARIZATION	ERP (KW)	HAAT	RCANSL
WARRIOR AL	US			HOR PLN	BH TILT	(METER) (METER)
33.4430	86.4830	(D.MHSS)	HORIZONTAL	100.000	0.000	299.0
			VERTICAL	100.000	0.000	299.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

CALCULATED HAAT FROM TOPO DATA BASE

ERP= 100.000 (KW) 20.0 (DBK) HAAT= 299.0 (METERS)

## INTERFERING DOMESTIC

DBU KM

CO CHANNEL ( 40.0) 171.9

1ST ADJACENT ( 54.0) 105.0

2ND ADJACENT ( 80.0) 33.7

3RD ADJACENT (100.0) 10.1

PROTECTED ( 60.0) 72.3

CITY GRADE ( 70.0) 50.0

SPECIAL C1 REFERENCE POINT

AZIMUTH	HAAT	HAAT	CONTOURS (KM)	
DEGREES	(METERS)	(FEET)	70 DBU	60 DBU
0.0	302.9	993.8	50.3	72.6
45.0	314.9	1033.0	51.1	73.5
90.0	289.1	948.4	49.4	71.5
135.0	256.8	842.4	47.1	68.8
180.0	294.4	965.9	49.7	71.9
225.0	307.7	1009.5	50.6	73.0
270.0	337.7	1107.8	52.6	75.2
315.0	288.6	946.8	49.3	71.5
AVERAGE	299.0	981.0	50.0	72.3

EST SITE ELEVATION : 121.9 m.f. 400.0 ft.

EST RAD CENTER AGL : 344.6 m.f. 1130.7 ft.

RAD CENTER A.M.S.L.: 466.5 m.f. 1530.7 ft.

\*\*\*\*\*

AZIMUTH	LAT	LONG	ERP (KW)	HAAT	D	I-CON	P-CON	IR	IC	WEZL
FROM TO CALL STS	FILE NUMBER	CITY	ST C	(D.MHSS)	REL CHW	HORZ VERT	(N) A F3010 F3050	DIST RSEP	RSEP IR	IR F
							(KN) (KN)	(KN) (KN)	(KN)	(KN)
242.7 62.2 WTXL LIC	BLH900119KA	Fayette	AL A	33.1917	87.4629	3RD 251C1	100.H100.V	276		
137.9 318.2 WAMV LIC	BLH820827AD	Sylacauga	AL A	33.1223	86.1354	2ND 252A	2.70H2.70V	94	101.1	82.
137.9 318.2 WAMV CP	BPH940304IA	Sylacauga	AL A	33.1223	86.1354	2ND 252A	5.0H 5.0V	69	80.0	75.
38.3 218.8 WKEAFM LIC	BLH840416BZ	Scottsbor	AL A	34.3522	85.5931	2ND 252A	2.35H2.35V	162	80.0	75.
205.9 25.4 WMLL LIC	BLH910627KC	Linden	AL A	32.0734	87.4402	1ST 253C1	100.H100.V	249	120.5	75.
88.8 270.2 WSBFM LIC	BLH880922KC	Atlanta	GA A	33.4535	84.2007	1ST 253C	100.H100.V	311	199.0	177.
290.2 109.1 WZLQ LIC	BLH4360	Tupelo	MS A	34.1809	88.4221	1ST 253C1	100.H	V 116	229.2	209.
283.0 101.7 WZLQ CP	BPH930812TB	Tupelo	MS A	34.1005	89.0923	1ST 253C1	100.H100.V	299	186.0	177.
332.7 152.7 MLBI LIC	BLH920506KC	Warrior	AL A	33.4909	86.5123	C0 254A	6.0H 6.0V	100	222.1	177.
341.2 161.2 MLBI VAC		Warrior	AL A	33.5304	86.5201	C0 254C3	H V		MOVING	9.7
42.6 223.3 ADD	RMB453	Ider	AL A	34.4843	85.3607	C0 254A	H V		DOC 93-277	16.7
326.7 146.1 ADD	RMB472	Cloverdal	AL A	34.5619	87.4617	C0 254A	H V		DOC 94-64	162.6
158.9 339.2 WBAWFM LIC	BLH890317KC	Montsomer	AL A	32.2411	86.1148	1ST 255C	100.H100.V	334	DOC 94-78	159.6
257.2 76.3 VAC		Brooksvil	MS A	33.2445	88.2925	1ST 255C3	H V		159.1	209.
255.1 74.2 NEW APP	BPH930728MA	Brooksvil	MS A	33.2040	88.3247	1ST 255C3	5.8H 5.8V	206E	160.4	144.
7.5 187.5 WAMR LIC	BLH891219KC	Huntsvill	AL A	34.4753	86.3824	2ND 256C	100.H100.V	300	167.3	144.
									118.2	105.

THE SHORT SPACING TO WBAW WILL BE ELIMINATED BY:

- 1) A DOWNGRADE TO C1 FROM A SPECIAL REFERENCE POINT; OR
- 2) A DOWNGRADE TO C2 FROM WBAW'S LICENSED SITE.

CHANNEL STUDY 254C1 - WARRIOR, ALABAMA

JOINT COUNTER PROPOSAL TO  
MM DOCKET 94-78 - CLOVERDALE, ALABAMA  
CH. 254C1 WARRIOR, AL / 255C1 MONTGOMERY, AL

MULLANEY ENGINEERING, INC.  
GAITHERSBURG, MARYLAND

FIGURE 2

SEPTEMBER 1994

\*\*\*\*\* FH CHANNEL STUDY NO. 2 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 1-SEP-94 16:51:39 \*\*\*\*\*  
 \*\*\*\*\* LAST UPDATE: 940818 \*\*\*\*\*

WBAH 255 C1 FR POLARIZATION ERP (KW) HAAT RCMNSL  
 MONTGOMERY AL US  
 32.1445 86.0730 (D.MWSS) HORIZONTAL 100.000 0.000 299.0  
 VERTICAL 100.000 0.000 299.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

CALCULATED HAAT FROM TOPO DATA BASE

ERP= 100.000 (KW) 20.0 (DBK) HAAT= 299.0 (METERS)

INTERFERING	DOMESTIC	HAAT	HAAT	CONTOURS (KM)
	DBU KM	(METERS)	(FEET)	70 DBU 60 DBU
CO CHANNEL ( 40.0)	171.9	45.0	1004.2	50.5 72.8
1ST ADJACENT ( 54.0)	105.0	90.0	978.3	50.0 72.2
2ND ADJACENT ( 80.0)	33.7	135.0	951.7	49.4 71.6
3RD ADJACENT (100.0)	10.1	180.0	917.1	48.7 70.7
		225.0	971.9	49.8 72.1
		270.0	985.0	50.1 72.4
		315.0	1019.0	50.8 73.2
PROTECTED ( 60.0)	72.3		1020.4	50.8 73.2
CITY GRADE ( 70.0)	50.0			
		AVERAGE	299.0 981.0	50.0 72.3

EST SITE ELEVATION : 61.0 m. / 200.0 ft.  
 EST RAD CENTER AGL : 312.5 m. / 1025.1 ft.  
 RAD CENTER A.M.S.L.: 373.4 m. / 1225.1 ft.

\*\*\*\*\*

AZIMUTH	FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.MWSS)	LONG	REL CHN	ERP (KW)	HAAT	D	I-CON	P-CON	IR	IC	REZLT				
											HORZ	VERT	(M)	A	F5010	F5050	DIST	RSEP	RSEP	IR	IC	REZLT
															(KM)	(KM)	(KM)	(KM)	(KM)			
260.8	80.4	NEW	APP		BPEB910521MA	Selma	AL A	32.0916	86.4637	IF 202C1	H100.V	219					62.3	34,				
258.9	78.6	NEW	APP		BPEB910116MS	Selma	AL A	32.0830	86.4443	IF 202C	1.85M53.0V	427					59.6	41,				
82.3	262.9	WAGH	LIC		BLH930601KE	Fort Mite	AL A	32.2148	85.0306	3RD 252A	6.00H6.00V	100					101.9	75,				
354.7	174.6	WAWV	LIC		BLH820827AD	Sylacauga	AL A	33.1223	86.1354	3RD 252A	2.70H2.70V	94					107.0	75,				
354.7	174.6	WAWV	CP		BPH940304IA	Sylacauga	AL A	33.1223	86.1354	3RD 252A	5.0H 5.0V	69					107.0	75,				
95.5	276.4	WISFKM	LIC		BLH921013KD	Americus	GA A	32.0451	84.1520	1ST 254C3	25.0H25.0V	92					177.3	144,				
338.9	158.5	WLBI	LIC		BLH920506KC	Warrior	AL A	33.4909	86.5123	1ST 254A	6.0H 6.0V	100	MOVING				187.4	133,				
339.4	159.0	WLBI	VAC			Warrior	AL A	33.5304	86.5201	1ST 254C3	H V		DOC 93-277				194.5	144,				
129.6	310.8	WBZE	APP		BPH891004IC	Tallahass	FL A	30.4013	83.5626	CO 255C1	17.5H17.5V	568					271.3	245,				
137.6	318.6	WBZE	LIC		BLH5718	Tallahass	FL A	30.2935	84.1700	CO 255C1	100.H100.V	119					261.7	245,				
339.0	158.9	WBAWFM	LIC		BLH890317KC	Montgomery	AL A	32.2411	86.1148	CO 255C	100.H100.V	334					18.7	270,				
265.2	83.8		VAC			Quitman	MS A	32.0200	88.4400	CO 255C3	H V						247.2	211,				
266.0	84.6	WYKK	APP		BPH930827IC	Quitman	MS A	32.0351	88.4327	CO 255C3	25.0H25.0V	1000					246.0	211,				
301.1	119.8		VAC			Brooksvil	MS A	33.2445	88.2925	CO 255C3	H V						256.5	211,				
299.0	117.7	NEW	APP		BPH930728MA	Brooksvil	MS A	33.2040	88.3247	CO 255C3	5.8H 5.8V	206E					257.5	211,				
95.6	276.1	WCKN	LIC		BLH921119KB	Lumpkin	GA A	32.0925	85.0551	2ND 257C2	50.H 50.V	150					97.4	79,				
332.1	151.7	WZRR	CP		BPH870227NB	Birmingham	AL A	33.2628	86.5300	3RD 258C	100.H100.V	305					150.4	105,				
329.2	148.8	WZRR	APP		BMPH910725IC	Birmingham	AL A	33.2311	86.5623	3RD 258C	100.H100.V	372					147.7	105,				

\*\*\*\*\*

CHANNEL STUDY 255C1 - MONTGOMERY, ALABAMA

JOINT COUNTER PROPOSAL TO  
 MM DOCKET 94-78 - CLOVERDALE, ALABAMA  
 CH. 254C1 WARRIOR, AL / 255C1 MONTGOMERY, AL

MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND

FIGURE 3  
 SEPTEMBER 1994

\*\*\*\*\* FM CHANNEL STUDY NO. 3 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 1-SEP-94 16152106 \*\*\*\*\*  
 \*\*\*\*\*  
 LAST UPDATE: 940818 \*\*\*\*\*

WDAF-M 255 C2 FM POLARIZATION ERP (KW) HAAT RCANSL  
 Montgomery AL US HOR PLN RM TILT (METER) (METER)  
 32.2411 86.1148 (D.WSS) HORIZONTAL 9.900 0.000 334.0 397  
 Deer South Broadcasts Company VERTICAL 9.900 0.000 334.0 397

THE FOLLOWING CONTOURS ARE CALCULATED USING:

CALCULATED HAAT FROM TOPO DATA BASE

ERP= 9.900 (KW) 10.0 (DBK) HAAT= 334.0 (METERS)

INTERFERING DOMESTIC  
 DBU KM  
 CO CHANNEL ( 40.0) 125.2  
 1ST ADJACENT ( 54.0) 77.0  
 2ND ADJACENT ( 80.0) 19.8  
 3RD ADJACENT (100.0) 5.1

LICENSED SITE

PROTECTED ( 60.0) 52.2

CITY GRADE ( 70.0) 33.0

AZIMUTH DEGREES	HAAT (METERS)	HAAT (FEET)	CONTOURS (KM)	
			70 DBU	60 DBU
0.0	320.6	1051.9	32.2	51.4
45.0	316.9	1039.8	32.0	51.1
90.0	350.0	1148.3	33.8	53.3
135.0	328.7	1078.4	32.7	51.9
180.0	330.3	1083.6	32.8	52.0
225.0	332.0	1089.3	32.9	52.1
270.0	344.7	1130.7	33.5	52.9
315.0	348.6	1143.6	33.7	53.2
AVERAGE	334.0	1093.7	33.0	52.2

\*\*\*\*\*

AZIMUTH		CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.WSS)	LONG	REL CHN	ERP (KW)		HAAT D (M)	I-CON F5010 (KM)	P-CON F5050 (KM)	IR DIST (KM)	IC RSEP (KM)	REZLT IR IC
FROM	TO									HORZ	VERT						
357.9	177.9	WAVV	LIC	DLH820827AD	Sulacausa AL A	33.1223	86.1354	3RD 252A	2.70M2.70V	94					89.1	55.	
357.9	177.9	WAVV	CP	BPH940304IA	Sulacausa AL A	33.1223	86.1354	3RD 252A	5.0M 5.0V	69					89.1	55.	
339.4	159.1	WLB1	VAC		Warrior AL A	33.5304	86.5201	1ST 254C3	H V			DOC 93-277			175.8	117.	
139.0	320.0	WBZE	LIC	BLN5718	Tallahass FL A	30.2935	84.1700	CO 255C1	100.H100.V	119					279.1	224.	
0.0	0.0	WDAF-M	LIC	DLH890317KC	Montgomery AL A	32.2411	86.1148	CO 255C	100.H100.V	334					0.0	249.	
261.7	80.3	WYKK	APP	BPH930827IC	Quitman MS A	32.0351	88.4327	CO 255C3	25.0M25.0V	1000					241.2	177.	
298.3	117.0		VAC		Brooksvil MS A	33.2445	88.2925	CO 255C3	H V						242.0	177.	
296.1	114.9	WEN	APP	BPH930728MA	Brooksvil MS A	33.2040	88.3247	CO 255C3	5.8M 5.8V	206E					243.4	177.	
331.1	150.8	WZRR	LIC	DLH7104	Birmingham AL A	33.2628	86.5300	3RD 258C1	100.H 50.V	265					131.8	79.	
331.1	150.8	WZRR	CP	BPH870227MB	Birmingham AL A	33.2628	86.5300	3RD 258C	100.H100.V	305					131.8	105.	
327.8	147.4	WZRR	APP	BPH910725IC	Birmingham AL A	33.2311	86.5623	3RD 258C	100.H100.V	372					129.3	105.	

\*\*\*\*\*

CHANNEL STUDY 255C2 - MONTGOMERY, ALABAMA

JOINT COUNTER PROPOSAL TO  
 MM DOCKET 94-78 - CLOVERDALE, ALABAMA  
 CH. 254C1 WARRIOR, AL / 255C1 MONTGOMERY, AL

MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND

FIGURE 3-A  
 SEPTEMBER 1994

**CERTIFICATE OF SERVICE**

I, Veronica Abarre, a secretary in the law firm of Mullin, Rhyne, Emmons and Topel, P.C., do hereby certify that on this 6th day of September, 1994, copies of the foregoing "JOINT COUNTERPROPOSAL" were sent by first class United States mail, postage prepaid, to the following:

\* Ms. Nancy V. Joyner  
Allocations Branch -- Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W.--Room 8314  
Washington, D.C. 20554

Mr. Hershel Lake, President  
Pulaski Broadcasting Company, Inc.  
P.O. Box 738  
Pulaski, TN 38478

Mr. Kirk A. Tollett  
Commsouth Media Associates  
4001 Highway 78 East  
Jasper, Alabama 35501  
(Consultant to Petitioner)

San Dow Broadcasting  
P.O. Box 2639  
Gulfport, MS 39503  
(Licensee of Station WZLQ(FM), Tupelo, MS)

  
Veronica Abarre

---

\*Hand Delivered